

COHEN & GREEN

June 28, 2024

Hon. Ona T. Wang, U.S.M.J.
United States District Court, Southern District of New York
Daniel Patrick Moynihan Courthouse, 500 Pearl Street
New York, New York 10007

By Electronic Filing.

Re: Case No. 22-cv-01445, Rodney v City of New York, et al.

Dear Judge Wang:

As the Court likely recalls, my firm, with co-counsel, represents Plaintiff in the case above. As directed by the Court, because today is the last Friday of the month, below is Plaintiff's monthly status report.

With one update, the parties remain in the same place they were in the last status letter. Plaintiff sent a follow up about requests that, like the IAB request discussed at the last conference, had answers that suggested the response was not based on full knowledge. Nothing further has been exchanged this month. That also means that various smaller questions Plaintiff has asked about Defendants' production remain unanswered,¹ but as we said last month, we're hopeful we will hear from Defendants on those issue after we receive an update about text message production.

As always, we thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

¹ These include:

1. What the file attached to a number of emails called "Report.arrestfolder.upload" was — instead of a native file, Defendants produced a placeholder stating there was a "technical" issue — and if it is an "applet or link that opens a shared folder or database of some kind," what the contents of the shared folder or database were (since such a database or folder has not been produced independently) (*see* Dkt. No. 203 at 1 n. 1);
2. Whether any Defendant specifically remembered emails from outside the handful of days after the incident, thus requiring additional collections not covered by the current search (*see* Dkt. No. 192 at 1, Dkt. No. 190 at 1; 2024-04-11 Tr. at 30:19-23);
3. Whether Defendants are willing to "run the remaining, disputed search terms solely for the purpose of generating a hit report so the parties can see if there is even anything to fight over" (Dkt. No. 192 at 1; Dkt. No. 190 at 2; 2024-04-11 Tr. at 30:23-25);



COHEN&GREEN P.L.L.C.

Attorneys for Plaintiff

1639 Centre St., Suite 216

Ridgewood, New York 11385

cc:

All relevant parties by electronic filing.